

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

CONGHUA YAN

Plaintiff,

v.

THE STATE BAR OF TEXAS, et al.

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§

Civil Action No. 4:23-CV-758-P

---

**DEFENDANT TARRANT COUNTY’S AND ASSOCIATE JUDGE LORI DEANGELIS’S  
RESPONSE TO PLAINTIFF’S OBJECTIONS TO FINDINGS, CONCLUSIONS, AND  
RECOMMENDATIONS (ECF NO. 122) AND BRIEF IN SUPPORT**

---

TO THE HONORABLE JUDGE MARK PITTMAN:

Defendants Tarrant County and Associate Judge Lori DeAngelis respectfully file this short Response to Plaintiff’s Objections to Findings, Conclusions and Recommendations (“FCR”) (ECF No. 122) and Brief. Both Tarrant County and Associate Judge DeAngelis filed motions to dismiss the claims Plaintiff asserted against them in this action. ECF Nos. 69, 70. In the FCR, Magistrate Judge Cureton correctly analyzed the legal grounds in these Defendants’ motions to dismiss to recommend the dismissal of Plaintiff Conghua Yan’s claims against Defendants Tarrant County and Associate Judge Lori DeAngelis. ECF No. 121 at PageID 1770-1775. Because there is no error in the FCR, this Court should overrule Plaintiff Conghua Yan’s objections to Magistrate Judge Cureton’s FCR (ECF No. 122 at PageID 1789-1793 & 1801-1802), should adopt the FCR (ECF No. 121), and should finally dismiss Plaintiff’s claims against Tarrant County and Associate Judge Lori DeAngelis.

Respectfully submitted,

/s M. Keith Ogle

**M. KEITH OGLE**

State Bar No. 24037207  
Assistant Criminal District Attorney

PHIL SORRELLS  
CRIMINAL DISTRICT ATTORNEY  
TARRANT COUNTY, TEXAS

Tarrant County Criminal District Attorney's Office  
Tim Curry Criminal Justice Center  
401 W. Belknap, 9<sup>th</sup> Floor  
Fort Worth, Texas 76196  
817-884-1233 - Telephone  
817-884-1675 – Facsimile  
E-Mail: mkogle@tarrantcountytx.gov

**ATTORNEY FOR DEFENDANTS  
TARRANT COUNTY AND ASSOCIATE  
JUDGE LORI DEANGELIS**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing document was served upon all parties who have appeared and are registered with ECF via electronic file provider, and will be sent to the following party via mail in accordance with the provisions of Rule 5, Fed. R. Civ. P., on January 10, 2023:

Conghua Yan  
2140 E. Southlake Blvd., Suite L-439  
Southlake, Texas 76092

/s/ M. Keith Ogle  
**M. KEITH OGLE**